

Submitter : Dr. Marcia Miller
Organization : Redmond High School
Category : Individual

Date: 10/17/2007

Issue Areas/Comments

GENERAL

GENERAL

The way that this legislation would affect families and students in Deschutes County is that the FAN program in the schools would be severely cut if not eliminated altogether. The FAN program in Deschutes County is an important service, providing immediate help to families in need in practical ways. The FAN advocate serves as a liason to students and families in need for many purposes, from helping them apply for medical help to giving school supplies to children whose families cannot afford them.

FAN has individuals helping individuals instead of bureaucracy and fraud and it would be a grave detriment to close this program through the reduction of funds.

I have seen how FAN representatives have helped students in direct and immediate ways. As a teacher, I can listen to a need of a student such as "I can't afford school supplies" to "I can't see the overhead and think I need glasses but we don't have insurance." I can refer the student to the FAN representative and the representative can help the student connect with resources in an immediate way. This is grass roots help at its best.

Many times, families at the federal poverty level do not know how to apply or are not aware of the programs that might help them. The FAN advocate helps to direct them to these resources even to help with filling out the complicated and endless forms.

Please reconsider cutting funding for such worthy programs as FAN. If you want to eliminate waste and fraud--this is not the way to do it. The FAN program is an effective, immediate, and streamlined way to identify those in need and connect them to resources.

Submitter : Becki Moore

Date: 10/17/2007

Organization : Teacher

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

Loss of funding for our FAN program would be devastating! I personally access my FAN advocate often to ensure that students and their families have some of the basic necessities. Please do not cut the funding for FAN.

Submitter : Mrs. Sunny Clark
Organization : City College of San Francisco
Category : Nurse Practitioner

Date: 10/17/2007

Issue Areas/Comments

GENERAL

GENERAL

As part of an institution dedicated to education and the intellectual growth of members of our society, we hereby would like to recognize our personnel for their efforts in disseminating important information to students and their family including minor children on accessing Medi-Cal health and psychological programs. Without these programs, if chronic illnesses ever befell on the students or families, they would have been impaired from pursuing their educational aspirations to become contributing members of our society.

Do not eliminate a valuable program because of the few who have chosen to abuse it. Unlike for those who used the MAA reimbursement dollars for less than stellar purposes, the MAA dollars are an essential source for decreasing the deficit and supporting ongoing departmental necessities such as:

- " Medi-Cal outreach and prevention education programs
- " Staff who are hired to do outreach and enroll students for health care services
- " Provision of health care services by nurse practitioners to those uninsured students who are not qualified for Medi-Cal
- " Medications and medical supplies for low income, uninsured students
- " Vaccinations for students

Other reasons not to eliminate the program in educational institutions:

- " A decentralized outreach system in schools is essential for students and parents, who can be reached easily, and is an efficient method of disseminating information.
- " When the source of information comes directly from a counselor or teacher, the students are reached in a more relevant manner.
- " We in higher education have become more passionate about reaching out to students and informing them on access to health care for themselves and their minor children.

Why punish those who follow the rules due to few of those who did not?

Without access to vital medical services such as hospital and emergency room care, doctor's visit, vision care, prescription drugs, mental health and other services that have become possible through Medi-Cal, and without the committed work that our school employees have done to assist, educate, and link students with resources and information on the application and qualifications about Medi-Cal, our students cannot be fully intellectually proficient, especially when they are physically or psychologically unwell. Wellness, we believe, is a prerequisite to all else.

Thank you,
Sunny Clark

Submitter : Mrs. Sandra Flores
Organization : Woodlake Public Schools
Category : Academic

Date: 10/17/2007

Issue Areas/Comments

GENERAL

GENERAL

I am opposed to CMS-2287-P. I believe it is a bad policy, and could result in increased costs through missed opportunities for kids to be covered by health insurance and for kids to be connected to services they need before health issues become catastrophic.

Further, contrary to CMS statement that school-based MAA is not necessary for the proper and efficient administration of the State plan, today's schools and their staff are the primary source of information and referral for families on a wide range of services including those covered by the Medicaid program. Parents trust and depend on school staff for information on everything from housing to food to health services and since virtually all children attend school it is absolutely a proper and efficient system to utilize.

In their proposed rule, CMS tries to make the case that all activities and services performed by school district staff simply support educational programs, overlap with educational programs, or are required by IDEA, and therefore don't directly or specifically benefit the Medicaid program. In fact, we know that every day school staff assists students in extraordinary ways that go above and beyond educational programs.

In the area of specialized transportation, CMS justifies this cut by saying that students receive transportation from home to school and back regardless of whether or not they are determined eligible for special education services. Therefore, they say, specialized transportation services should not be reimbursable through the LEA program. Of course, what CMS is ignoring is that the cost of providing specialized transportation either in a wheel chair accessible vehicle or litter van is significantly more expensive than transportation provided to regular education students.

For these reasons, I believe this is a policy that will hurt our children in the end.

Submitter : Dr. G. Ronald Brown
Organization : Berkeley County Schools
Category : Local Government

Date: 10/18/2007

Issue Areas/Comments

GENERAL

GENERAL

It seems strange that for a number of years now the schools have had the authority to conduct Medicaid administrative activities and suddenly someone is deciding that it is wrong. I can see no difference in our people performing these duties than the private sector. Medicaid billing is now a part of our finance structure. People have jobs in our sector that would be eliminated by this change. What has prompted this change? Was there fraud? If so, punish the offending parties not all school systems.

Submitter : Dr. Joanne Welch

Date: 10/18/2007

Organization : East Longmeadow Public Schools

Category : Academic

Issue Areas/Comments

GENERAL

GENERAL

Please do not eliminate this form of reimbursement. School systems are desperate for any supplemental funding that helps to make ends meet. It is key that all sectors, public and private, work together to provide for the children in public schools. Reducing funding in any form will have consequences. Thank you

Submitter : Dr. Debra Walker

Date: 10/18/2007

Organization : Member, Monroe County School Board

Category : Local Government

Issue Areas/Comments

GENERAL

GENERAL

8,000 or more students will be negatively impacted by the proposed rule changes. These reimbursement dollars fund some of the cost to provide school health services. Healthy students make better learners. Please feel free to call me with any questions, comments or concerns that you may have. 305.293.1400 x 53360. Respectfully submitted on behalf of the students in Monroe County Florida

Submitter : Mrs. Laurel Variel

Date: 10/18/2007

Organization : Deschutes County Family Access Network

Category : Other Health Care Professional

Issue Areas/Comments

GENERAL

GENERAL

Deschutes County Family Access Network (F.A.N.) is a tremendously successful, 15 yr. old, program networking resources for 'at risk' students and families. In-kind partnerships with each of the County's public schools plus two early childhood centers allows a family advocate to safely and confidentially meet with clients. This accessible neutral territory allows 'relationships' to be nurtured. Resources range from lending an ear, to school supplies, food, clothing, housing, health and medical referrals, including the Oregon Health Plan. 60+% of our funding derives from Title XIX - M.A.C., Medicaid Administrative Claiming. F.A.N.'s reputation and success is recognized locally and nationally.

If the MAC funding were extinguished, we, the community, would lose a BIG piece of the puzzle. There would be 'deaths' and 'grieving'. It would be a huge shame.

Submitter :

Date: 10/18/2007

Organization :

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

Dear Honorable Leader,

As an employee of an educational institution, City College of San Francisco, I would like to inform you of the very valuable outreach services that I provide through MAA to the many uninsured students who drop by requesting any resources (brochures, applications, etc.) that may help guide them to find the specific Medi-Cal health and psychological services for themselves or a family member during, before or after their medical concern has occurred. Offering possible Medi-Cal links is a way of ensuring that the students can reach their educational goals as a healthy well-adjusted person.

Please do not eliminate the MAA program. It is a valuable source of dollars to provide Medi-Cal outreach and preventative educational programs to low income and uninsured students so that they may continue their pursuit of a higher education for a brighter future and to be a more productive citizen.

Margaret Mendiola
CCSF SHS

Submitter : Mrs. Rebecca Barrett
Organization : Redmond High School
Category : Other Practitioner

Date: 10/18/2007

Issue Areas/Comments

GENERAL

GENERAL

Dear Sir,

Our current FAN program provides an excellent array of services for our students at this high school. I have had many homeless students over my 29 years of teaching. We see a variety of needs that include clothing, insurance, eyeglasses and helping identify how they can get more services. I have been in more than 22 districts in the state as a consultant and I can say that without these services, our students in Oregon would not fair well. Many of our students at this high school (30%) are on a free and reduced meal plan. In order for them to do well in school, the research states unequivocally that their basic needs need to be met first. The proposed rule will impose a significant burden on Deschutes County school districts, forcing cuts in services to more than 4,200 disadvantaged children and families.

CMS-2287-P will impose a significant financial burden on local school districts throughout the nation, which is estimated to cost \$3.6 billion over five years. In our county, our FAN program has been extremely effective and all one has to do to see that is to look at the data that has been effectively kept over the years. I encourage you to look at the data. It will speak for itself.

Mrs. Barrett
Science Teacher
Redmond High School

Submitter : Mrs. Susan Kirkland
Organization : Douglas County School System
Category : Speech-Language Therapist

Date: 10/19/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-2287-P-375-Attach-1.DOC

Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: CMS-2287-P
7500 Security Boulevard, Baltimore MD 21244

October 19, 2007

To Whom It May Concern:

I am very concerned that the U.S Dept. of Health & Human Services has proposed a rule to eliminate Medicaid funding of administrative services and transportation. Funding from these sources is crucial and brings in much needed monies to provide quality services to our special education population through these avenues. It helps to supplant the deficit left by Congress' inadequate funding of IDEA. Administrative support and transportation are critical to implementation of special education services.

Sincerely,

Susan T. Kirkland
Speech Program Supervisor/Medicaid Liaison
Douglas County School System
Douglasville, GA 30134
(770) 651-3433

Submitter : Marjorie Rollins

Date: 10/19/2007

Organization : California Local Educational Consortium (LEC)

Category : State Government

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-2287-P-376-Attach-1.PDF

California Local Educational Consortium (LEC) School-Based Medi-Cal Administrative Activities (SMAA)

Statewide Coordinators

Region I
Greg Englar
Sonoma County
707/524-2765
genklar@sonomasel.pa.org

Region II
Eileen Dolan
Glenn County
530/865-1267
edolan@glenncoe.org

Region III
Marjorie Rollins
Sutter County
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Region IV
Michelle Cowart
Contra Costa County
925/942-5391
mccowart@cccocoe.k12.ca.us

Region V
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Santa Cruz County
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Region VI
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209/558-4106
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Region VII
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Region VIII
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Region IX
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Region X
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San Bernardino County
909/386-2910
christine_ridley@sbcss.k12.ca.us

Region XI
Cathy Bray
Los Angeles County
562/922-6473
bray_cathy@lacoed.edu

October 19, 2007

Secretary Michael Leavitt
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-2287-P
7500 Security Boulevard
Baltimore, MD 21244

Dear Secretary Leavitt:

The California School-Based Medi-Cal Administrative Activities (SMAA) Local Educational Consortium (LEC) Committee **strongly opposes CMS-2287-P** and unequivocally urges you to withdraw the proposal to eliminate reimbursement under Medicaid for school administration expenditures and for costs related to transportation of school-age children between home and school.

The SMAA LEC Committee is comprised of eleven regional SMAA LEC Coordinators. All members are County Office of Education (COE) employees, each with the primary responsibility for SMAA guidance to local educational agencies (LEA) contracting with the LEC to participate in SMAA. The LECs represent all sizes of school districts, from a one-school rural district to the largest urban district in California.

The LEC Committee members work directly with local school employees who have ongoing, personal relationships with Medicaid-eligible school-age children and their families. We understand what local communities would lose if the SMAA funding were to be eliminated.


If CMS-2287-P is enacted, California's school communities would lose funding for beneficial and effectual activities such as the following:

- Outfitting buses with specialized equipment
- Transporting children to school for their medical appointments
- Hiring staff to identify students who need screenings and evaluations
- Connecting students and their families with health services in their communities
- Coordinating services that schools must now provide in order to meet multiple student needs while trying to fulfill No Child Left Behind requirements
- Sustaining Healthy Start centers and health clinics
- Hiring nurses, social workers, and specialized health professionals

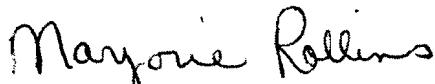
Helping you to educate healthier students

We earnestly urge you to advance the federal, state, and local effort to provide early detection and treatment of preventable medical conditions among our school-age children. The California LEC Committee strongly recommends that you withdrawal this proposed rule.

Sincerely,



Cathy Bray, RN, MEd
LEC Committee Co-Chair



Marjorie Rollins
LEC Committee Co-Chair

Submitter : Mr. John McLAUGHLIN

Date: 10/19/2007

Organization : Deschutes county commission on Children

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

The Family Access Network is one of the most important elements of our county's social service network and is a prototype of the future in meeting children where they aggregate and serves their needs. I was volunteering as a reader with first graders and had a young boy who just didn't want to read. A FAN person discovered that the boy needed reading glasses. You wouldn't believe the amazing change in attitude and interest in reading coming from this boy. He was no longer "stupid" or different, he could now see to read. If you had seen the excitement in this little boy, you would not consider cutting this program.

Submitter : Mrs. Shirley Robinson
Organization : Santa Clara County Office of Education
Category : Local Government

Date: 10/21/2007

Issue Areas/Comments

GENERAL

GENERAL

Our organization serves disabled children with significant needs for adapted materials to communicate and interact with their environment. Many could not even ask for a drink of water without this equipment. The MAA funds are critical to continue to provide these students with the adaptations they need. Adapted materials are quite expensive and the funds from MAA allow these students to get what they need. It evens the playing field for many of our deaf and orthopedically impaired students. In our organization every dollar collected through MAA activities goes right back into providing materials and services to these children. Items such as eye gaze electronic communication devices so that a child with cerebral Palsy can now independently communicate using only eye movements have been purchased with this money. A variety of low and high tech communication devices for our autistic students have been purchased. Adapted chairs and gait trainers have been purchased so that these students can actively participate in the school and community. This is just a few of the items that have improved the quality of lives so significantly. Please reconsider the proposal to eliminate MAA funds. It would hurt the most needy of children and the most vulnerable. Thank you so much for taking the time to review this most important funding source for so many children.

Submitter : Ms. MC Zhuang
Organization : Santa Clara County Office of Education
Category : Speech-Language Therapist

Date: 10/21/2007

Issue Areas/Comments

GENERAL

GENERAL

The funds have been crucial in supporting our students' educational needs. The elimination of the funds will be most detrimental to the students with special needs.

Submitter : Ms. Linda Anderson
Organization : Santa Clara County Office of Education
Category : Academic

Date: 10/21/2007

Issue Areas/Comments

GENERAL

GENERAL

Please do NOT eliminate this very much needed source of funding for our students with disabilities. In education we are providing much needed therapy services that Medicaid might otherwise need to provide itself. Education of our children is grossly underfunded in many ways and this funding assist us in providing a variety of crucial things that we otherwise could not afford.

Linda C. Anderson
Principal
Chandler Tripp School
Santa Clara County Office of Education
San Jose, California

Submitter : Ms. Phyllis Seid

Date: 10/21/2007

Organization : SCCOE

Category : Speech-Language Therapist

Issue Areas/Comments

GENERAL

GENERAL

This money is so needed for our special needs children. As an SLP I have been able to purchase incredible products and programs to help these children communicate. Please please do not take away this much needed funding.

Thank you,
Phyllis Seid
SLP
SCCOE

Submitter : Mrs. Barbara Lewis

Date: 10/21/2007

Organization : Santa Clara County Office of Education

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

As a principal for Special Education in the Santa Clara Office of Education, I can not stress strongly enough how important these funds are to serve our multi-handicapped student population. Their needs are so great, and the Medicaid money pays for equipment that is most necessary for their progress and, indeed, helping them to reach their highest potential-in many cases, allowing them to contribute to society in their own way. Loss of these funds would be a severe blow to these students. Please continue the availability of this most important resource for our children. If you have any questions, please contact me at (408)392-3931. Thank you for your support. Barbara Lewis

Submitter : Ms. Prachi Tare

Date: 10/22/2007

Organization : Santa Clara County of Education

Category : Speech-Language Therapist

Issue Areas/Comments

GENERAL

GENERAL

Please continue the program as it is really beneficial to get materials and aids including communication aids for students.

Submitter : Ms. Barbara Biafore
Organization : Santa Clara County Office of Education
Category : Nurse

Date: 10/22/2007

Issue Areas/Comments

GENERAL

GENERAL

I am a school nurse for Santa Clara County Office of Education. I work with medically fragile students, and these funds support these students. These are students are handicapp and require assistance: both physically and financially. These funds help the county and the nurses so we can provide the help these students need.

Submitter : Ms. Elena Watson
Organization : Santa Clara County Office of Education
Category : Other Government

Date: 10/22/2007

Issue Areas/Comments

GENERAL

GENERAL

Hello,

I am an administrator for Santa Clara County Office of Education. My primary care are for student that have sever handicapping conditions. To eliminate the reimbursement under medicaid for School Administration Expenditures would have a negitive effect for our students and for the school districts themselves who contract with us. Students would not get served in the appropriate manner now and layoffs to our nursing care would be great. Please keep medicaid program to the public school system.

Thank you.
Elena Watson

Submitter : Ms. Fran Krepchin

Date: 10/22/2007

Organization : SCCOE

Category : Speech-Language Therapist

Issue Areas/Comments

GENERAL

GENERAL

Please do not stop these funds. I work with children who are severely handicapped and mostly non-verbal. These funds have allowed us to purchase communication devices for all the non-verbal students who need them. It also allows us to purchase materials designed specifically for instruction for this population. Without these funds many students will have to share communication devices or not have access to the most appropriate device for their needs. Thank you.

Submitter : Ms. Charlowe Ibarra
Organization : Santa Clara County Office of Education
Category : Physical Therapist

Date: 10/22/2007

Issue Areas/Comments

GENERAL

GENERAL

OT/PT services are a vital asset to the Santa Clara County Office of Education (SCCOE) students. As an OT/PT, our job is to give suggestions to teachers and families on how to improve the student's success in school, with motor related tasks. This job cannot be efficiently and effectively done without the funds from the Medicaid program. Typically these funds are for purchasing therapy related pieces of equipment which range from something as simple as an adaptive pen, to an adaptive seat or mobility device. Rehabilitation and therapy equipment is quite expensive, and Medicaid funds have been extremely helpful in getting these students the assistance they need to reach their goals. Please re-consider to keep the Medicaid program for the sake of the children and their future successes in school and in life.

Submitter : Elizabeth Ross

Date: 10/22/2007

Organization : Santa Clara County Office of Education Deaf/HOH

Category : Other Health Care Professional

Issue Areas/Comments

GENERAL

GENERAL

This is to express my concern regarding

CMS 2287P (the Elimination of Reimbursement under Medicaid for School Administration Expenditures) As an educational audiologist within a large deaf and hard of hearing program servicing the Santa Clara County Office of Education I can tell you that this funding is essential. Due to the mandated newborn screening more and more children are being identified and are requiring services from the school sector. In addition, many children are receiving cochlear implants and a great deal of the rehabilitation is falling on the school speech therapists and school audiologists to provide therapy services. This has required us to increase our staff, therapy and assessment materials to provide appropriate services for these children. The reimbursement under Medicaid has provided us with additional funding to fulfill this increased demand put on the public schools.

I urge you to NOT ELIMINATE this funding. Thank you for your time!

Submitter : Mrs. Deborah Yoon
Organization : Santa Clara County Office of Education
Category : Nurse

Date: 10/22/2007

Issue Areas/Comments

GENERAL

GENERAL

Special Education statutes recognized the rights of individuals with disabilities and demonstrated the long term social and economic benefits of investing in these individuals. The decreases in financial backing of the statutes over the past decade has threatened our ability to provide basic services to students served by IDEA.

As an Early Start school nurse in an urban setting, it is my responsibility to identify and refer students to healthcare providers and resources. Current funding levels do not even cover salaries and school building expenses. Medicare funds are critical to providing classroom materials and staff continuing education opportunities to ensure an enriching, supportive educational environment for these vulnerable members of our society.

"The moral test of a government is how it treats those who are at the dawn of life, the children; those who are in the twilight of life, the aged; and those who are in the shadow of life, the sick and the needy, and the handicapped." - Hubert Humphrey

Submitter : Ms. Muriel Meunier-Fiebelkorn

Date: 10/22/2007

Organization : City College of San Francisco

Category : Individual

Issue Areas/Comments

GENERAL

GENERAL

"See Attachment"

CMS-2287-P-390-Attach-1.TXT

CMS-2287-P-390-Attach-2.TXT



**CHILD DEVELOPMENT AND FAMILY STUDIES
1860 Hayes St. Room 138 San Francisco, CA 94117**

As part of an institution dedicated to education and the intellectual growth of members of our society, we hereby would like to recognize our personnel for their efforts in disseminating important information to students and their family—including minor children—on accessing Medi-Cal health and psychological programs. Without these programs, acute health problems or chronic illnesses can interrupt the student or family's pursuit of their education goals.

Do not ELIMINATE a valuable program because of the few who have chosen to abuse it. Unlike those who have misused the MAA reimbursement dollars, our department has found the MAA dollars to be an essential source for decreasing the deficit and supporting ongoing departmental necessities such as:

- Referral of families and students to Medi-Cal programs and providers
- Medi-Cal outreach to families and students
- Preventive health education programs
- Staff how are hired to do outreach and enroll students for health care services

Other reasons not to eliminate the program in educational institutions:

- A decentralized outreach system in schools is essential for students and parents, who can be reached easily, and is an efficient method of disseminating information.
- When the source of information comes directly from a counselor or teacher, the students are reached in a more relevant manner.
- We in higher education have become more passionate about reaching out to students and informing them on access to health care for themselves and their minor children.

Why punish those who follow the rules due to few of those who did not?

Without access to vital medical services such as hospital and emergency room care, doctor's visit, vision care, prescription drugs, mental health and other services that have become possible through Medi-Cal, and without the committed work that our school employees have done to assist, educate, and link students with resources and information on the application and qualifications about Medi-Cal, our students cannot be fully intellectually proficient, especially when they are physically or psychologically unwell. Wellness, we believe, is a prerequisite to all else.

Sincerely,

Muriel Meunier-Fiebelkorn, Grant Coordinator
Dianne Velleno, Health Educator
Akiyo Mineo-Aldis, Intake Clerk

Submitter : Mrs. Dianne Velleno
Organization : City College of San Francisco
Category : Academic

Date: 10/22/2007

Issue Areas/Comments

GENERAL

GENERAL

Please see Attachment

CMS-2287-P-391-Attach-1.TXT

Submitter : Ms. Akiyo Mineo-Aldis
Organization : City College of San Francisco
Category : Individual

Date: 10/22/2007

Issue Areas/Comments

GENERAL

GENERAL

See Attachment



CHILD DEVELOPMENT AND FAMILY STUDIES
1860 Hayes St. Room 138 San Francisco, CA 94117

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Sincerely,

Muriel Meunier-Fiebelkorn, Grant Coordinator
Dianne Velleno, Health Educator
Akiyo Mineo-Aldis, Intake Clerk